

April 17, 2015

Mr. Robert Werner Enforcement Officer (6SF-TE) United States Environmental Protection Agency Region 6 1445 Ross Avenue Dallas, Texas 75202

## VIA U.S. Mail and email to Werner.Robert@EPA.gov

Re: General Notice Letter for the CES Environmental Services, Inc. — Houston Superfund Site

Houston, Harris County, Texas PRP Notice Letter to PPG Industries, Inc.

Dear Mr. Werner:

I am writing in response to the General Notice Letter dated February 27, 2015 (the "General Notice Letter"), from Region 6 of the United States Environmental Protection Agency ("EPA") regarding the CES Environmental Services, Inc. – Houston Superfund Site, Harris County, Texas (the "Site") that was served on the agent for service of process for PPG Industries, Inc. ("PPG") on or about March 3, 2015. EPA's General Notice Letter advised PPG of its potential liability at the Site pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9607(a). According to EPA and the information provided by EPA with the General Notice Letter, shipments of certain materials that contained "waste hazardous substances" were allegedly generated by PPG and shipped by CES Environmental to the Site. Based on the information provided by EPA, it would appear that the materials allegedly originated from the former PPG facility in LaPorte, Texas (the "LaPorte Facility"). Please note that, on or about January 28, 2013, a merger transaction involving the chlor-alkali and derivatives business (the "CA&D Business") of PPG and a merger subsidiary of Axiall Corporation ("Axiall") was completed. The LaPorte Facility was part of the PPG CA&D Business, and is thus now owned and operated by a subsidiary of Axiall. According, Axiall is responding to the General Notice Letter instead of PPG because, based on the information provided, the potential liability at the Site relates to the former PPG CA&D Business.

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As requested in the General Notice Letter, and without admitting to any liability at the Site or any of the facts outlined in the General Notice Letter, Axiall hereby advises you of its willingness and intent to enter into settlement negotiations with EPA concerning this matter.

Please feel free to contact the undersigned with any questions and notify me if a meeting with EPA regarding the Site is proposed or scheduled.

Sincerely,

Daniel J. Brown

Sr. Counsel (EHS & Risk Mgmt)